From: Sally H [sallyhayati@gmail.com]

Sent: 8/22/2017 4:56:28 PM

To: Dr. Philip Fine [pfine@agmd.gov]

CC: Board Chairman William Burke Consultant Patrick [mwpatrick@aqmd.gov]; Board Member Ben Benoit

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Subject: TRAA response to ToRC letter to SCAQMD dated 8/1/2017

Attachments: 2017-08-22 AQMD PR 1410-TRAA response to ToRC letters.pdf

Dear Dr. Fine,

The Torrance Refinery Action Alliance (TRAA) and the many thousands of community members we represent are supportive of and grateful for the SCAQMD staff's "initial conclusion" that it is necessary to phase out modified hydrofluoric acid (MHF) technology. The Torrance Refining Company's (ToRC) letter of August 1, 2017, to the contrary, expressed disappointment and dismay at what it calls a "premature position" (letter attached). But this position is long overdue.

The 1990 Torrance-Mobil Consent Decree was meant to eliminate the dangers of hydrofluoric acid (HF) alkylation at the Torrance refinery. But ever since its signing, the refinery has waged an effective campaign that, in Congressman Ted Lieu's words, "hoodwinked" the community into believing false claims that an additive, along with other Band-Aid "safety" measures, made MHF alkylation "24-times safer than sulfuric acid," an HF alternative.

The SCAQMD staff has found that evidence does not support ToRC's MHF safety claims, and TRAA's eight-member Science Advisory Panel agrees. TRAA's initial response to ToRC's letter is attached. The evidence is overwhelming that MHF is as deadly as HF at refinery temperatures and pressures. We are also preparing a full response that addresses each issue raised by ToRC in its letter.

MHF is a failed R&D effort; but as a PR tool it's been a great success at saving HF alkylation from a ban in California, up to now. The community will not allow this deception to continue any longer. We appreciate the SCAQMD's efforts to get the facts on MHF.

Sincerely,

Sally Hayati, Ph.D.

President, the Torrance Refinery Action Alliance (TRAA)

Links and Attachments:

ToRC 8/1/2017 Letter: http://bit.ly/2vlklDJ

TRAA Science Advisory Panel Bios: http://bit.ly/2lo3xZr

TRAA response to ToRC Aug. 1, 2017 letter https://drive.google.com/file/d/0B0sm-

0cQ1vDqNTF0dzRrQXRma1E/view?usp=sharing